

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO**

\* \* \* \* \*

**COMPLAINANT,**

**TRI-STATE GENERATION AND  
TRANSMISSION ASSOCIATION, INC.,**

**RESPONDENT.**

## JOINT REQUEST TO ADOPT CONSENSUS PROCEDURAL SCHEDULE

## **PROPOSED PROCEDURAL SCHEDULE**

2. Accordingly, the Parties reached consensus on the procedural schedule set forth below.

<b>Proposed Procedural Schedule</b>	
<b>Date</b>	<b>Procedural Activity</b>
March 15, 2019	Direct Testimony (initiating 210-day statutory timeline, which will conclude October 9, 2019) (discovery commences on Direct Testimony)
April 29, 2019	Answer Testimony (discovery commences on Answer Testimony and concludes on Direct Testimony)
May 29, 2019	Rebuttal/Cross-Answer Testimony (discovery commences on Rebuttal/Cross-Answer Testimony and concludes on Answer Testimony)
June 17–21, 2019	Evidentiary Hearing
July 1, 2019	Statements of Position Due
August 19, 2019	Commission Decision
September 9, 2019	Applications for Rehearing, Reargument, or Reconsideration (RRR) Due
October 9, 2019	Commission RRR Decision (if any)

3. This proposed procedural schedule is structured such that it anticipates a decision on any jurisdictional issues at the Commissioners Weekly Meeting on February 14, 2019.

4. Tri-State, DMEA, and CEO propose that the Commission utilize the discovery timelines in Commission Rules of Practice and Procedure 4 CCR 723-1-1405(b)–(d) without modification in this proceeding.

WHEREFORE, DMEA, Tri-State, and CEO respectfully request that the Commission issue an order adopting the procedural schedule set forth herein.

DATED this 11th day of February 2019.

Respectfully submitted,

/s/ Matthew S. Larson  
Raymond L. Gifford, #21853  
Matthew S. Larson, #41305  
Wilkinson Barker Knauer LLP  
1755 Blake Street, Suite 470  
Denver, Colorado 80202  
Phone: (303) 626-2350  
Email: rgifford@wbklaw.com  
mlarson@wbklaw.com

and

Michael L. O'Donnell, #10273  
Wheeler Trigg O'Donnell LLP  
370 17th Street, Suite 4500  
Denver, Colorado 80202  
Phone: (303) 244-1850  
Email: odonnell@wtotrial.com

**ATTORNEYS FOR DELTA-MONTROSE  
ELECTRIC ASSOCIATION**

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Thomas J. Dougherty  
Thomas J. Dougherty, #30954  
Dietrich C. Hoefner, #46304  
1200 17th Street, Suite 3000  
Denver, Colorado 80202  
Phone: (303) 623-9000  
Email: tdougherty@lrrc.com  
dhoefner@lrrc.com

SHERMAN & HOWARD LLC

Robert E. Youle, #9541  
Michael B. Carroll, #18736  
Jerome H. Sturhahn, #36903  
633 17th Street, Suite 3000  
Denver, Colorado 80202  
Phone: (303) 297-2900  
Email: ryoule@shermanhoward.com  
mcarroll@shermanhoward.com  
jsturhahn@shermanhoward.com

Kenneth V. Reif, #10666  
Timothy B. Woolley, #34570  
Tri-State Generation and Transmission  
Association, Inc.  
P.O. Box 33695  
Denver, Colorado 80233  
Phone: (303) 452-6111  
Email: kreif@tristategt.org  
twoolley@tristategt.org

**ATTORNEYS FOR TRI-STATE  
GENERATION AND TRANSMISSION  
ASSOCIATION, INC.**

PHILIP J. WEISER  
Attorney General

/s/ Jessica L. Lowrey  
Jessica L. Lowrey, #45158  
Natural Resources and Environment Section  
1300 Broadway, 7th Floor  
Denver, Colorado 80203  
Telephone: 720.508.6167  
Email: jessica.lowrey@coag.gov

**ATTORNEY FOR THE COLORADO  
ENERGY OFFICE**

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of February 2019, a copy of the foregoing **JOINT REQUEST TO ADOPT CONSENSUS PROCEDURAL SCHEDULE** was filed with the Colorado Public Utilities Commission via e-file and a copy was served via e-mail to the following:

Ken Reif	kreif@tristategt.org	Tri-State
Rick Gordon	rick.gordon@tristategt.org	Tri-State
Tom Dougherty	tdougherty@lrrc.com	Tri-State
Dietrich Hoefner	dhoefner@lrrc.com	Tri-State
Robert Youle	ryoule@shermanhoward.com	Tri-State
Michael Carroll	mcarroll@shermanhoward.com	Tri-State
Jerome Sturhahn	jsturhahn@shermanhoward.com	Tri-State
Timothy Woolley	twoolley@tristategt.org	Tri-State
John D. Parker	jparker@unitedpower.com	United Power, Inc.
Michael L. O'Donnell	odonnell@wtotrial.com	United Power, Inc.
Peter W. Herzog III	pherzog@wtotrial.com	United Power, Inc.
Trina K. Zagar-Brown	tzbrown@wrea.org	White River Electric Association, Inc.
Alan J. Michalewicz	amich@wrea.org	White River Electric Association, Inc.
Matthew Gerhart	matt.gerhart@sierraclub.org	Sierra Club
Ana Boyd	ana.boyd@sierraclub.org	Sierra Club
David M. Doder	ddoder@hfak.com	San Luis Valley Rural Electric Cooperative
Loren Howard	lhoward@slvrec.com	San Luis Valley Rural Electric Cooperative
Randolph W. Starr	randy@starrwestbrook.com	PVREA
Michael A. Westbrook	mike@starrwestbrook.com	PVREA
Jeffrey C. Wadsworth	jwadsworth@pvrea.coop	PVREA
Jack P. Wolfe	wolfelaw@uos.net	Nebraska Tri-State Members
David A. Jarecke	dave@nebenergylaw.com	Nebraska Tri-State Members
Jack P. Wolfe	wolfelaw@uos.net	Mountain View Electric Association
James R. Gerler	jgerler@petersen-fonda.com	Joint Cooperative Movants
Karl F. Kumli	karlk@dietzedavis.com	LPEA
Gabriella Stockmayer	gstockmayer@dietzedavis.com	LPEA
Graciela Maldonado	gracie@dietzedavis.com	LPEA
Mike Dreyspring	mdreyspring@lpea.coop	LPEA

Bob Lynch	blynch@lpea.coop	LPEA
Ron Meier	rmeier@lpea.coop	LPEA
Justin Talbot	jtalbot@lpea.coop	LPEA
Jerry Wills	jcwills@lpea.coop	LPEA
Levi Williamson	lwilliamson@awwlawyers.com	Highline, Y-W, Mountain Parks
Bryson Fredregill	bfredregill@awwlawyers.com	Highline, Y-W, Mountain Parks
Erin A. Overturf	erin.overturf@westernresources.org	Joint Conservation Parties
Ellen Howard Kutzer	ellen.kutzer@westernresources.org	Joint Conservation Parties
Gwen Farnsworth	gwen.farnsworth@westernresources.org	Joint Conservation Parties
Mark Pearson	mark@sanjuancitizens.org	Joint Conservation Parties
Howard Geller	hgeller@swenergy.org	Joint Conservation Parties
Justin Brant	jbrant@swenergy.org	Joint Conservation Parties
Rick Gilliam	rick@votesolar.org	Joint Conservation Parties
Michael Hiatt	mhiatt@earthjustice.org	Joint Conservation Parties
Eleanor Greer	egreer@earthjustice.org	Joint Conservation Parties
Jacob Schlesinger	jschlesinger@keyesfox.com	COSEIA
Beren Argetsinger	bargetsinger@keyesfox.com	COSEIA
Mike Kruger	mkruger@coseia.org	COSEIA
Jessica Lowry	jessica.lowrey@coag.gov	CEO
Lindsey Stegall	lindsey.stegall@state.co.us	CEO
Jocelyn Durkay	jocelyn.durkay@state.co.us	CEO
Barbara Dory	barbara.dory@coag.gov	CEO
Raymond Gifford	rgifford@wbklaw.com	DMEA
Matthew Larson	mlarson@wbklaw.com	DMEA
Michael L. O'Donnell	odonnell@wtotrial.com	DMEA
Jasen Bronec	jasen.bronec@dmea.com	DMEA

/s/ Hannah Bucher

Hannah Bucher